

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

SEA STAR LINE, LLC,
a limited liability company,

CASE NO. 3:04-CV-146-99HTS

Plaintiff,

-vs-

EMERALD EQUIPMENT LEASING, INC.,
a corporation,

Defendant.

**MOTION OF ALAN I. MOLDOFF, GARY M. SCHILDHORN, AND
MARK PFEIFFER TO APPEAR PRO HAC VICE**

Alan I. Moldoff, Esq., Gary M. Schildhorn, Esq., and Mark Pfeiffer, Esq. of ADELMAN LAVINE GOLD AND LEVIN, move for special admission to appear in this case as counsel for Emerald Equipment Leasing, Inc. ("Emerald"), defendant in the underlying action, and state as follows:

1. Movant Alan I. Moldoff is an attorney licensed to practice law in good standing in the State of New Jersey since 1978 and the State of Pennsylvania since 1979. In addition, Mr. Moldoff is a member in good standing of the United States District Court for New Jersey, and the United States District Courts for the Eastern and Middle Districts of Pennsylvania.

2. Movant Gary Schildhorn is an attorney licensed to practice law in good standing in the State of Pennsylvania since 1977. In addition, Mr. Schildhorn is a member in good standing of the United States District Court for New Jersey, the United States District Courts for the Eastern District of Pennsylvania, and the United States District Court for Delaware.

3. Movant Mark Pfeiffer is an attorney licensed to practice law in good standing in the State of Pennsylvania since 1994. In addition, Mr. Pfeiffer is a member in good standing of the United States District Court for the Eastern District of Pennsylvania.

4. Movants designate Michael L. Gore, of the firm Shutts & Bowen LLP, 300 South Orange Avenue, Suite 1000, P.O. Box 4956, Orlando, Florida 32802-4956, who is both qualified to practice in this Court and who consents to designation as local counsel under Local Rule 2.02.

5. Movants certify that they have never been disbarred and are not currently suspended from the practice of law in the State of Florida or any other state nor from any United States District Court or Court of Appeals.

6. Movants certify further that they are familiar with and shall be governed by the local rules of this court, the rules of professional conduct and all other requirements governing the professional behavior of members of The Florida Bar.

7. Movants certify that under separate cover, they have submitted to the Court the Special Admission Attorney Certification forms, along with the payment of the fee required pursuant to the local rules of the Middle District of Florida. Copies of those forms are attached hereto as composite Exhibit "A."

WHEREFORE, Movants respectfully requests admission pro hac vice in this matter.

Dated: December 22, 2004.

Respectfully submitted,

Gary M. Schildhorn, Esq.

Alan I. Moldoff, Esq.

Mark Pfeiffer, Esq.

ADELMAN LAVINE GOLD AND LEVIN

A Professional Corporation

Suite 900, Four Penn Center

Philadelphia, PA 19103-2808

Phone: (215) 568-7515

Fax: (215) 557-7922

Attorneys for Emerald

/s/ Alan I. Moldoff, Esq.

Alan I. Moldoff, Esq.

CONSENT TO ACT AS LOCAL COUNSEL

MICHAEL L. GORE, an attorney qualified to practice in this Court, consents to designation as local counsel for Emerald and agrees to serve as designee with whom the Court and opposing counsel may readily communicate regarding the conduct of this case, and upon whom papers shall be served, and agree to be responsible for the progress of the case, including trial.

/s/ Michael L. Gore

Michael L. Gore, Esq.

Florida Bar No. 441252

SHUTTS & BOWEN LLP

300 South Orange Avenue, Suite 1000

Orlando, Florida 32801

Mailing Address

Post Office Box 4956

Orlando, Florida 32802-4956

Telephone: 407-423-3200

Facsimile: 407-425-8316

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd of December, 2004, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will sent a notice of electronic filing to the following:

Timothy J. Armstrong, Esq.
Armstrong & Mejer
2600 Douglas Road
Suite 1111, Douglas Center
Coral Gables, FL 33134

/s/ Michael L. Gore
Michael L. Gore

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**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA**

**SPECIAL ADMISSION
ATTORNEY CERTIFICATION**

This attorney certification form and the information contained herein neither replaces nor supplements the filing and service of pleadings, motions, or other papers as required by law, rule, or court order. This form is required for use by the Clerk of Court in furtherance of the Guidelines and Plan Administration of Non-Appropriated Funds as adopted by this Court and this form will not be handled as a pleading, motion, or other paper filed in a case before the Court.

Sea Star Line, LLC

Plaintiff(s)/Petitioner(s),
v.

CASE NO: 3:04 CV 146-J-99 HTS

Emerald Equipment Leasing, Inc.

Defendant(s)/Respondent(s)

I, Michael L. Gore, Esq. hereby submit this attorney certification form to the Court on behalf of Alan I. Moldoff, Esq.

ATTORNEY INFORMATION

Firm Name: Adelman Lavine Gold and Levin

Address: Suite 900, Four Penn Center

City: Philadelphia State: PA Zip: 19103-2808

Firm/Business Phone: 215-568 - 7515 Alternate Phone: - -

Firm/Business Fax: 215-557 - 7922

E-mail Address: amoldoff @ adelmanlaw.com

ATTORNEY CERTIFICATION

I certify that:

1. To my knowledge there are NO disciplinary or suspension proceedings pending against me in any Court of the United States or of any State, Territory, or Possession of the United States. NOTE: if proceedings ARE pending at this time, please explain on the reverse side of this form.
2. I am not a resident of the State of Florida.
3. I do not make frequent or regular appearances in separate cases to such a degree as to constitute the maintenance of a regular practice of law in the State of Florida.
4. Within the twelve (12) month period preceding the date of this attorney certification, I have read the most current version of the Local Rules of the United States District Court for the Middle District of Florida.

I declare under penalty of perjury that the foregoing is true and correct.

Signature

Michael L. Gore

Date

12/20/04

EXHIBIT A

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA**

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Sea Star Line, LLC

Plaintiff(s)/Petitioner(s).

v.

CASE NO: 3:04 CV 146-J-99 HTS

Emerald Equipment Leasing, Inc.

Defendant(s)/Respondent(s)

I, Michael L. Core, Esq. hereby submit this attorney certification form to the Court on behalf of Gary M. Schildhorn, Esq.

ATTORNEY INFORMATION

Firm Name: Adelman Lavine Gold and Levin

Address: Suite 900, Four Penn Center

City: Philadelphia State: PA Zip: 19103-2808

Firm/Business Phone: 215- 568 - 7515 Alternate Phone: - -

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Defendant(s)/Respondent(s)

I, Michael L. Gore, Esq., hereby submit this attorney certification form to the Court on behalf of Mark Pfeiffer, Esq.

ATTORNEY INFORMATION

Firm Name: Adelman Lavine Gold and Levin
Address: Suire 900, Four Penn Center
City: Philadelphia State: PA Zip: 19103 - 2808
Firm/Business Phone: 215 - 568 - 7515 Alternate Phone: - -
Firm/Business Fax: 215 - 557 - 7922
E-mail Address: mpfeiffer @ adelmanlaw.com

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4. Within the twelve (12) month period preceding the date of this attorney certification, I have read the most current version of the Local Rules of the United States District Court for the Middle District of Florida.

I declare under penalty of perjury that the foregoing is true and correct.

Signature Mark Pfeiffer

Date Dec. 16, 2004